



March 22, 2012

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

John E. Benedict
Assistant Vice President
Federal Regulatory Affairs
1099 New York Ave., NW
Suite 250
Washington, DC 20001
Tel: (202) 429-3114
Fax: (913) 397-3836
john.e.benedict@centurylink.com

Re: *Lifeline and Link-Up Reform and Modernization*, WC Docket No. 11-42;
Federal-State Joint Board on Universal Service, CC Docket No. 96-45;
Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

On March 22, USTelecom submitted an ex parte letter summarizing a meeting held by representatives of AT&T, CenturyLink, Frontier, Verizon, Windstream, and USTelecom with the Wireline Competition Bureau. At the meeting, the industry representatives explained that ILECs and other tariffed, post-paid carriers need more time to implement the Commission's significant new changes to the Lifeline and LinkUp programs. CenturyLink wishes to clarify and correct the portion of the industry group's letter, specific to CenturyLink. CenturyLink has approximately 100 local operating companies that will result in over 90 tariff filings or similar submissions to implement the new Lifeline discount. Also, with respect to advice letter or tariff filings in Nevada, there is a 30-day notice period followed by being placed on the Nevada Commission's semi-monthly agenda for approval, if the filing is unopposed, which process at a minimum generally takes 45-60 days.

As reflected in the ex parte, the Commission's *Lifeline Modernization Order* makes major reforms to the Lifeline and LinkUp programs. For tariffed carriers, these changes require extensive tariff work, customer notices, and state approvals, as well as IT development work to revise billing systems. CenturyLink supports USTelecom and encourages the Commission to grant the petition filed by it, ERTA, ITTA, NTCA, OPASTCO, and WTA.

Respectfully submitted,

John E. Benedict

cc: Carol Matthey
Kim Scardino
Jonathan Lechter
Garnet Hanly
Robert Abb